From: Newell, Duane

To: "Jason Grubb"; "Scott Pieratt"

Subject: RE: JC Hunt/Wolf Creek Questions

Date: Thursday, March 18, 2021 3:16:00 PM

Attachments: Wolfcreekpassjchunt311corder.41410.pdf

Good afternoon Jason and Scott,

In looking at some of the past site reports they mentioned the cleanup level of 2.2 ug/L for Benzene in the Ground Water Monitoring Report- May 2018 Event, 5.0 ug/L for benzene in the Groundwater Monitoring Report – 2019 Annual Event, and Pete's notes stated 2.5 ug/L for benzene. I see no mention toluene, ethylbenzene, total xylenes and of total volatile petroleum hydrocarbons (TVPH) cleanup levels. This information should be in the site work Plan and/or other site reports. Scott per our call you are going to try and locate these reports and email them to me and I will check my office files. I have attached a copy of the Administrative Order.

If you have to redrill MW-5 I do not see the need for soil sampling if none was done initially.

Current wells proposed to be sampled are: MP-1A, MP-2A, MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, and T-2. If possible, I would like to see temporary wells T1, T3, T4, T5, T6, T8 and T9 sampled so that we have coverage of the spill area? The Sampling and Analysis Plan for this sampling event must be for defensible data and include provisions for trip blanks, duplicates, and MS/MSD samples to be submitted with each batch of samples collected per the analytical method selected. Additional QA/QC samples may be added if method or defensible data packages would require them. Defensible data packages should be submitted with the sampling report.

Once cleanup levels are achieved wells will have to be plugged/abandoned per state regulations. Site restoration of all site activities pursuant to US Forest Service and Colorado Department of Transportation Specifications will have to be met. A Final Completion Report shall be due 120 days after the completion of the Removal Action which should included information and data on all activities conducted onsite with proof of compliance of the EPA Administrative Order.

Thank you,

Duane Newell
Federal On-Scene Coordinator (FOSC)
U.S. Environmental Protection Agency, Region VIII
(8SEM-EMR)
1595 Wynkoop Street
Denver, CO 80202-1129

Office Phone: 303-312-6129

From: Jason Grubb <Jason.Grubb@apexcos.com>
Sent: Wednesday, March 17, 2021 3:11 PM
To: Newell, Duane <Newell.Duane@epa.gov>
Subject: JC Hunt/Wolf Creek Questions

Duane,

I am wrapping up the proposal/workplan for the JC Hunt spill site near Wolf Creek and I have a couple of questions.

- For the groundwater standards it looks like we use the Colorado Basic Standards for Groundwater for the wells by the road and the surface water standards for the wells in the wetlands. Just wanted to make sure this is correct.
- Monitoring well MW-5 did have elevated concentrations of benzene during the last sampling event. We are planning to make another attempt at finding it this spring using GPR. If we cannot find it we are planning to replace it with MW-5R. Do we need to include soil sampling during the drilling? The boring log and well log from MW-5 are attached for reference. It look like no sampling was conducted during the drilling of the well, only PID readings from the cuttings. We will need to use ODEX due to the subsurface conditions and with bedrock I am not sure that soil samples will provide much useful information.

Thank you Jason



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